

# EXHIBIT C

**AFFIDAVIT OF**  
**Keith D. Flynn**

STATE OF MICHIGAN )  
 ) SS  
COUNTY OF WAYNE )

I, Keith D. Flynn, being first duly sworn and affirmed upon my oath, hereby state as follows. The below are comments given in truth, to the best of my ability, and if called to testify I would be competent to testify as to such.

1. I am employed by Miller Cohen, P.L.C. as an attorney. My title at Miller Cohen, P.L.C. is Senior Associate.
2. I represent Natalie Reeser in her lawsuit against Henry Ford Health System.
3. The time spent on this case as noted on the statement of attorney fees (***Exhibit F***) is taken from the firm's system for tracking attorney time.
4. The entries on the statement of attorney fees are from records of time keeping. The information on the statement is generated from the information submitted on this software.
5. The entries on the statement of attorney fees are true and correct. All time recorded on the statements reflects time actually spent on this case and only reflects hours I spent on post-judgment matters in the United States District Court for the Eastern District of Michigan and for the successful appeal before the Sixth Circuit. I have not represented Ms. Reeser in any other matter. All of the factual assertions on the First Supplemental Motion for Attorneys' Fees are true and correct based on my knowledge and belief.
6. I graduated summa cum laude from Albion College with a Bachelor's degree in Political Science and Management. I then attended Michigan State University where I attained my Juris Doctorate cum laude and a Master's degree in Human Resources and Labor Relations. While at Michigan State, I served on the editorial board of the Michigan State Law Review. I have performed worked for the National Labor


Relations Board in Detroit and acted as a member of the Bargaining Support Team at Michigan State University negotiating the first contract for a newly certified bargaining unit of non-tenured track faculty. Most recently, I received the Spirit of Detroit Award. In my over six years of practice, I have successfully acted as lead counsel in multiple jury trials, administrative hearings, and arbitrations in employment and labor law matters.

7. I have experience in representing workers in various actions, including on an individual basis—like Ms. Reeser—and on behalf of their respective unions. Miller Cohen P.L.C. has represented numerous clients on issues related to whistleblower actions, and the attorneys involved in this case practice nearly exclusively in labor and employment law.

Further affiant sayeth not.

  
Keith D. Flynn

Subscribed and sworn to before me on  
this 6<sup>th</sup> day of July, 2017

  
Jamie L. Vann, Notary Public  
Macomb County, acting in Wayne County, MI  
My Commission Expires: 08/05/2021